



Christopher Bateman
O: 212.838.7797
D: 212.220.2926
cbateman@cohenmilstein.com

Cohen Milstein Sellers & Toll PLLC
88 Pine Street, 14th Floor
New York, NY 10005
cohenmilstein.com

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Via ECF

Honorable Margo K. Brodie
225 Cadman Plaza East, Chambers N 626
Brooklyn, NY 11201

Re: *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litigation*,
No. 1:05-md-1720
Old Jericho Enterprise, Inc. v. Visa, Inc., No. 20-CV-2394 (E.D.N.Y.)

Dear Judge Brodie:

Plaintiffs in the *Old Jericho* case submit this letter with consent from Defendants. Pursuant to the Court's direction, the parties in *Old Jericho* have met and conferred about proposed redactions to the Court's order on Plaintiffs' motion for summary judgment (ECF No. 9406) (the "Order"). In general, Plaintiffs and Defendants take the view that no redactions to the Order are necessary with respect to their own information. However, the Order quotes certain third-party documents designated Confidential or Highly Confidential. Plaintiffs have reached out to the third parties to provide them the opportunity to inform us whether any redactions are necessary. A number of the third parties have responded to confirm that no redactions of their material are necessary; however, other third parties have not yet responded, or have responded that they need more time. The third parties who have not responded are: BP, Heartland, and Sinclair. Fiserv's counsel has advised Plaintiffs that they need more time to consult with their client.

Plaintiffs and Defendants propose to give the aforementioned third parties more time to provide their position and propose to redact their material designated Confidential or Highly Confidential for the time being pending their response. Attached hereto is the proposed redacted version of the Order that redacts only that material. If the Court would like to order a deadline by which the third parties must respond with their position, Plaintiffs would be happy to promptly notify the third parties of that deadline.

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Respectfully submitted,

/s/ Christopher Bateman

Christopher Bateman

Attachment